

**WYNDHAM VACATION OWNERSHIP
SEXUAL HARASSMENT POLICY
(REVISED 9/25/06)**

Wyndham Vacation Ownership is firmly committed to developing and maintaining a zero-tolerance policy concerning sexual and other forms of harassment in the Company's workplace; to swiftly and firmly respond to any conduct of which the Company becomes aware that violates the prohibition against sexual harassment and other forms of harassment; to implementing and maintaining a disciplinary system that is designed to strongly deter future acts of harassment; and to actively monitor its workplace to ensure tolerance, respect and dignity for all its employees.

Sexual harassment is a form of employee misconduct, which interferes with work productivity and wrongfully deprives employees of the opportunity to work in an environment free from unsolicited and unwelcome sexual advances, requests for sexual favors, and other such verbal or physical conduct. Sexual harassment is prohibited and is a violation of the law. Sexual harassment has many different definitions, and it is not the intent of this policy to limit the definition of sexual harassment, but to give employees as much guidance as possible concerning what activities may constitute sexual harassment. Prohibited conduct includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, and other similar verbal or physical contact of a sexual nature where:

- Submission to such conduct is either an explicit or implicit condition of employment;
- Submission to or rejection of such conduct is used as a basis for making an employment-related decision;
- The conduct unreasonably interferes with an individual's work performance; or
- The conduct creates a hostile, intimidating or offensive work environment.

Sexual harassment may be male to female, female to male, female-to-female or male-to-male.

Actions, which may result in charges of sexual harassment include, but are not limited to, the following:

1. Unwelcome physical contact, including touching on any part of the body, kissing, hugging or standing so close as to brush up against another person.
2. Requests for sexual favors either directly or indirectly.
3. Requiring explicit or implicit sexual conduct as a condition of employment, a condition of obtaining a raise, a condition of obtaining new duties or any type of advancement in the workplace; also, implying or threatening termination or unfairly evaluating performance.

Other behavior that may seem innocent or acceptable to some people can constitute sexual harassment to others. Behaviors to be sensitive to include, but are not limited to:

1. Unwelcome sexual flirtations, advances, jokes or propositions.
2. Unwelcome comments about an individual's body or personal life.
3. Openly discussing intimate details of one's own personal life
4. Sexually degrading words to describe an individual.
5. The display in the workplace of objects, pictures, cartoons or writings that might be perceived as sexually suggestive.

If an employee believes he or she has been subjected to sexual harassment, the corrective steps are as follows:

1. Immediately report the incident to a supervisor. If the employee is not comfortable speaking to his or her supervisor or the supervisor of the harasser, the incident should be reported to any member of management, their Human Resources manager, Shari Grady at 615-884-2971 or call the toll-free Wyntegrity Line at 1-866-949-9963.
2. Support Human Resources' investigation of the allegations that includes the preparation of a written statement identifying the alleged harasser, the sexually harassing conduct, and possible witnesses who can confirm the allegations.

